

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA

E. RAY RAYNOR,	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b>Civil Action File No.:</b>
	)	
G4S SECURE SOLUTIONS (USA) INC.;	)	
CHUCK BROCK, individually, and as	)	
Strategic Account Executive Vice-	)	
President; DONALD S. ZECCARDI,	)	
individually, and as Strategic Account	)	
Vice-President; MALCOLM C.	)	
BURCHETT, JR., individually, and as	)	
Mid-Atlantic Executive Vice President;	)	
TIFANI A. GRUSKY, individually and as	)	
Mid-Atlantic Region, Director of	)	
Administration; MICHAEL A. NAIL,	)	
General Manager, Charlotte, North	)	
Carolina office,	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL OF CIVIL ACTION**

Consistent with 28 U.S.C. § 1446, Defendant G4S Secure Solutions (USA) Inc., Chuck Brock, Donald S. Zeccardi, Malcolm C. Burchett, Jr., Tifani A. Grusky, and Michael A. Nail, (“the G4S Defendants”), file this Notice of Removal of Civil Action from the Superior Court Division for Gaston County, North Carolina, Civil Division, in which it is pending. In support of the removal, the G4S Defendants state:

1. Plaintiff E. Ray Raynor filed a Summons and Complaint in the Superior Court Division for Gaston County, North Carolina, captioned *E. Ray Raynor v. G4S*

*Secure Solutions (USA), Inc., Chuck Brock, Donald S. Zeccardi, Malcolm C. Burchett, Jr., Tifani A. Grusky, and Michael A. Nail*, Case No. 17-CVS-645 (“Superior Court Action”). The G4S Defendants were served with the Summons and Complaint on or about March 9, 2017. *See Exhibit A.*

2. Plaintiff’s Complaint alleges violations of Title VII of the Civil Rights Act of 1964, as amended (“Title VII”), 42 U.S.C. § 2000e-5, *et seq.*, violations of 42 U.S.C. § 1981, and conspiracy to violate 42 U.S.C. § 1985. *See Exhibit A.* Accordingly, this Court has original jurisdiction over Plaintiff’s Title VII, Section 1981, and Section 1985 claims under 28 U.S.C. § 1331. Plaintiff’s state law claims fall within the supplemental jurisdiction of this Court under 28 U.S.C. § 1367, because they all arise from Plaintiff’s employment with G4S. Therefore, these claims are based on a common nucleus of operative facts and are so related to Plaintiff’s Title VII, Section 1981, and Section 1985 claims, that they form the same case or controversy. Because this action satisfies the requirements of 28 U.S.C. § 1331, this Court has original and supplemental jurisdiction over all claims alleged in the Complaint, and this action may be removed to this Court consistent with 28 U.S.C. § 1441(a).

3. Consistent with 28 U.S.C. § 1446(a), G4S has attached all process, pleadings and orders that have been filed, served, or received in this action. *See* Exhibit A.

4. Venue lies with this Court, because Plaintiff's action is pending in this District. *See* 28 U.S.C. § 1441(a).

5. This Notice of Removal is filed within thirty (30) days of service of the Superior Court Action and is timely under 28 U.S.C. § 1446(b).

6. Consistent with 28 U.S.C. § 1446(d), written notice of removal of this case (Exhibit B), together with a copy of this Notice will be filed with the Clerk of the Superior Court Division, Gaston County, North Carolina, and served on Plaintiff.

The G4S Defendants request that this action be removed from the Superior Court Division, Gaston County, North Carolina, and request that this Court assume jurisdiction over the case.

This 24<sup>th</sup> day of March, 2017.

Respectfully submitted,

/s/ Kelly Eisenlohr-Moul

Kelly Eisenlohr-Moul  
NC Bar No. 50523  
Lewis Brisbois Bisgaard & Smith LLP  
1180 Peachtree Street NE  
Suite 2900  
Atlanta, Georgia 30309  
Telephone: (404) 991-3790  
Facsimile: (404) 467-8845  
Email: Kelly.Moul@lewisbrisbois.com

Joseph D. Budd  
NC Bar No. 44263  
Lewis Brisbois Bisgaard & Smith LLP  
4101 Lake Boone Trail  
Suite 514  
Raleigh, North Carolina 27607  
Telephone: (919) 821-4020  
Facsimile: (919) 829-0055  
Email: Joseph.Budd@lewisbrisbois.com

Counsel for Defendants

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this **NOTICE OF REMOVAL OF CIVIL ACTION** was served by electronic mail using the Court's CM/ECF system on all counsel or parties of record.

This 24<sup>th</sup> day of March, 2017.

/s/ Kelly Eisenlohr-Moul

Kelly Eisenlohr-Moul

NC Bar No. 50523

Lewis Brisbois Bisgaard & Smith LLP

1180 Peachtree Street NE

Suite 2900

Atlanta, Georgia 30309

Telephone: (404) 991-3790

Facsimile: (404) 467-8845

Email: Kelly.Moul@lewisbrisbois.com

Joseph D. Budd

NC Bar No. 44263

Lewis Brisbois Bisgaard & Smith LLP

4101 Lake Boone Trail

Suite 514

Raleigh, North Carolina 27607

Telephone: (919) 821-4020

Facsimile: (919) 829-0055

Email: Joseph.Budd@lewisbrisbois.com

Counsel for Defendants